

Message

From: Nassif, Julianne (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MASSMAIL-01/CN=RECIPIENTS/CN=JULIANNE.NASSIF]
Sent: 11/12/2009 3:52:45 PM
To: Hanchett, James (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MASSMAIL-01/CN=RECIPIENTS/CN=James.Hanchett]
Subject: RE: [REDACTED]

Jim,

Please do. We do not want to get in the habit of providing this as the discovery packet!

From: Hanchett, James (DPH)
Sent: Thursday, November 12, 2009 10:35 AM
To: Nassif, Julianne (DPH)
Subject: FW: [REDACTED]

Hi Julie,

I just received this email today. This is a District Court case involving 2 submissions, 89 packets for 2.61 g. and 33 packets at .88 g.. I could spend a week getting all the documentation. I will check with the head narcotics ADA to see if I can send usual documents, chain of custody ,lab notes and technical papers.

This is what will really slow the Lab down if this continues.

Jim

From: Yereniuk, Anne (WES)
Sent: Tue 11/10/2009 3:03 PM
To: Hanchett, James (DPH)
Subject: [REDACTED]

Hi Jim,

The trial date on this case and the co-defendant [REDACTED] was moved to 2/10/2010. In the meantime the defense attorney filed a discovery motion which was allowed and the compliance date is 12/29/2009. The court has ordered me to provide the following information about your training and testing methods by 12/29:

1. Training

- a. any classroom, educational background, continuing education seminars (I did provide a basic CV for you but if you have more detailed information - your CV just states where you got your degree, please let me know)
- b. Any documented training records for you
- c. Any certification programs that analysts at your lab are required to complete
- d. Any proficiency/competency evaluations

2. Actual testing:

- a. Standard operating procedures for analytical testing, sampling
- b. Sampling plans
- c. Document control -- how do you and the other analysts make sure the methods used are current versions?
- d. Test method validation protocols and reports
- e. Test results - both initial test and any confirmatory testings - full test data, not a summary report
- f. Data integrity - how are the results tracked and documented?
- g. Standards - traceable source for reference samples and verification procedure for standards

h. Reagents used - source and verification

3. Instrumentation:

- a. Type, model and manufacturer
- b. Specifications for resolution, sensitivity
- c. Calibration frequency and records
- d. Maintenance schedule/records
- e. Lab audits and frequency
- f. Audit results - from the most recent audit

4. Data review and interpretation for results (in this case)

5. Data sources for interpretation, computer program and/or resource material

If any of these items are confusing, let me know. I'm literally typing out the defense attorney's motion. If you do not have certain items of information, please let me know who else I should contact in the lab to get this information. I do apologize for this. I did object to the motion, arguing that all of this could be fleshed out at a voir dire examination of you but the judge didn't buy it. If you have any questions, please call me at (413) 538-7152 X12. I appreciate your cooperation.

Thank you.

Sincerely,
Anne Yereniuk

*Anne Yereniuk
Assistant District Attorney
Hampden County District Attorney's Office
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